

# **Exhibit 1**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ABC Corporation I et al,

*Plaintiff,*

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

*Defendants.*

**CASE NO.** 1:20-cv-04806

**Judge:** Honorable Thomas M. Durkin

**DECLARATION OF XIE RONGQING**

I, Xie Rongqing, declare as follows:

1. I am over eighteen (18) years of age. I make this affidavit based on my own knowledge.
2. I am the owner of the company Dongguan Saibotan Nengyuan Keji (Energy Tech) Co. Ltd. ("Dongguan Saibotan"). Dongguan Saibotan owns and operates the Amazon storefront Gyroor-US.
3. Gyroor-US' accused product was made based on the D808,857 patent which it's authorized to use.
4. Gyroor-US' accused product does not infringe Plaintiffs' design patents (the D737,723, D738,256, D785,112, D784,195 patents).
5. Gyroor-US account has been frozen for more than eight months. More than \$1 million USD have been frozen.
6. I did not receive any email from Plaintiffs before December 29, 2020.
7. I received a second email from Plaintiff on January 29, 2021.
8. I have never received any notice of preliminary injunction.
9. I was not aware of the preliminary injunction until around January 1, 2021.

10. In the last eight months, because of the cash flow restraints, the company had to layoff several employees.
11. In the last eight months, I borrowed from my friends and family just to raise money to pay the remaining employees and keep the company running.
12. Dongguan Saibotan had great business relationships with its suppliers. Many suppliers allowed Dongguan Saibotan to delay the payment after knowing the assets were restrained. But recently, some suppliers had demanded payment of outstanding invoices before the end of August.
13. The company has no extra cash to pay the employees and suppliers and I cannot raise any extra cash.
14. The frozen asset is urgently needed so the company can pay the employees and the suppliers.
15. If Dongguan Saibotan does not receive the frozen asset before the end of August, it will have no other option but to close business.
16. It would be extremely unfair because the company has done nothing wrong
17. Dongguan Saibotan's business reputation has already been ruined, and its store ranking and market share has dropped significantly.
18. I beg this Court to review the preliminary injunction and release the Gyroor-US account because there is no infringement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 8/9/2021

By: Xie Rong Qing